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VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions to allow him to attend a birthday party and dinner for his son at local venues on July 19, 2024. The specific time and location of the events shall be disclosed to and approved by Pretrial Services not less than 72 hours in advance. Mr. Goetsche will be accompanied by a third-party custodian at each event.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkts 187, 193, 225, 229, 252, 258, 270, 281, 290, 305, 311 and 323). The Court previously denied a motion to modify bail conditions (dkt. 268). The aforementioned proposed modification would not otherwise modify any other conditions as previously set forth or modified by this Court.

Pretrial Services and the government, through AUSA Anthony Torntore, have no objection to this proposed request. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
CLARK SMITH VILLAZOR LLP

cc: Matthew Menchel, Esq.
Sean Buckley, Esq.
Carolina Leung, Esq.
Government counsel of record (via ECF and e-mail)
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